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MEMO ENDORSED

Plaintiffs' requested extension is granted. Betancourt and Trebbau shall complete document production no later than December 5, 2014. The depositions of Betancourt and Trebbau shall occur no later than December 14, 2014. Betancourt and Trebbau shall file their renewed motions to dismiss no later than December 28, 2014.

So ordered.
November 14, 2014

VIA ECF

Honorable J. Paul Oetken
United States District Court, Southern District of New York
40 Foley Square
New York, NY 10007



J. PAUL OETKEN
United States District Judge

Re: *The Honorable Otto J. Reich, et al. v. Betancourt Lopez, et al., No. 13-cv-5307*

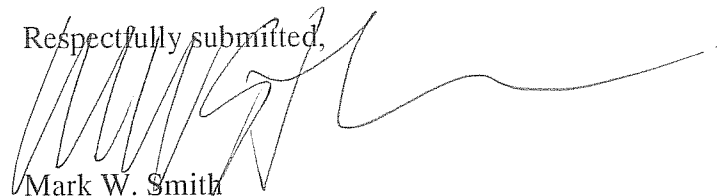
Dear Judge Oetken:

We represent the Honorable Otto J. Reich and Otto Reich Associates, LLC (together, "Plaintiffs"), and write to ask that the dates set forth in the Court's order dated November 13, 2014, be amended to account for the fact that the Thanksgiving holiday is the week of November 24, which makes the court-ordered dates problematic.

Specifically, the Order provides that the Defendants have until Monday, November 24, 2014 to complete their production. Then, the depositions of Betancourt and Trebbau are to be completed by December 1, 2014. The Thanksgiving holiday falls on the week of November 24, which means that even if both depositions were conducted on Wednesday November 26, Plaintiffs would only have one business day after receiving defendants' documents to prepare for both depositions, which would then occur on the eve before Thanksgiving. And any suggestion that a deposition occur on the Friday immediately following Thanksgiving is unfairly prejudicial, given the existence of previously scheduled travel plans for that week.

Plaintiffs request that the depositions be completed on or before December 8, 2014 to account for the Thanksgiving holiday week.

Respectfully submitted,



Mark W. Smith

cc: Frank H. Wohl, Esq. (Counsel for Leopoldo Alejandro Betancourt Lopez)
Joseph A. DeMaria, Esq. (Counsel for Pedro Jose Trebbau Lopez)
Shawn Rabin, Esq. (Counsel for Francisco D'Agostino Casado)